

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FILED  
10/25/22 9:34 am  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

IN RE: )  
MATTHEW CHARLES BARR )  
MICHELE JANE BARR, )  
Debtors ) Bankruptcy No. 22-70188-JAD  
AMERICREDIT FINANCIAL SERVICES, INC. ) Chapter 13  
dba GM FINANCIAL, ) Doc. # 44  
Movant ) Related To Document No. 32  
v. )  
MATTHEW CHARLES BARR )  
MICHELE JANE BARR, )  
Respondent(s) )  
RONDA J. WINNECOUR, )  
Trustee )  
)

**STIPULATION**

NOW COMES, AmeriCredit Financial Services, Inc. dba GM Financial (“GM Financial”), by and through its counsel, Morton & Craig LLC, and Matthew and Michele Barr (“Debtors”) by and through their counsel Jeffrey Wayne Ross, Esquire, and stipulate and agree as follows:

**RECITALS**

WHEREAS, the Debtors filed a voluntary petition for relief under Chapter 13 of Title 11, United States Code on June 3, 2022;

WHEREAS, the Debtors and GM Financial are parties to a Motor Vehicle Installment Sales Contract dated March 17, 2016 (the “Contract”) whereby the Debtors financed the purchase of a 2013 Dodge Durango bearing vehicle identification number 1C4RDJDG9DC509436 (the “Vehicle”);

WHEREAS, the Debtors filed a Chapter 13 Plan on June 17, 2022 in which the Debtors proposed to modify GM Financial's lien and pay GM Financial a total of \$4,098.00 with no interest for the Vehicle;

WHEREAS, GM Financial filed a secured proof of claim on June 24, 2022 in the amount of \$4,126.75 with contract interest accruing at an annual rate of 9.99%;

WHEREAS, the Debtors and GM Financial have resolved the issues surrounding the Debtors' treatment of GM Financial's secured claim in the Chapter 13 Plan and seek to enter into this Stipulation to resolve said issues.

NOW THEREFORE, the Debtors and GM Financial hereby stipulate and agree as follows:

1. The Chapter 13 Plan dated June 17, 2022 shall incorporate the terms of this Stipulation as it relates to GM Financial's secured claim or if the Debtors decide to file an amended Chapter 13 Plan, said amended Chapter 13 Plan shall incorporate the terms of this Stipulation as it relates to GM Financial's secured claim.

2. That GM Financial shall have a secured claim in the amount of \$4,126.75 with annual interest to accrue at 6.0%, with any remainder of GM Financial's claim to be treated as an unsecured claim.

3. That GM Financial shall retain its lien on the Vehicle until the earlier of payment of the underlying debt under non-bankruptcy law or the Debtors receiving a discharge.

4. That this Stipulation shall become null and void, without further Order of Hearing, if the Debtors' underlying Chapter 13 Bankruptcy case is converted to a Chapter 7 case or if the underlying Chapter 13 Bankruptcy case is dismissed.

Consented To:

/s/ William E. Craig  
William E. Craig, Esquire  
PA ID# 92329  
Morton & Craig LLC  
110 Marter Ave. Suite 301  
Moorestown, NJ 08057  
(856) 866-0100  
bcraig@mortoncraig.com  
Attorney For GM Financial

/s/ Jeffrey Wayne Ross  
Jeffrey Wayne Ross, Esq.  
PA ID #201479  
Harold Shepley & Associates, LLC  
209 West Patriot St.  
Somerset, PA 15501  
(814) 444-0500  
jross@shepleylaw.com  
Attorney for Debtors

/s/ Katherine M. DeSimone  
Katherine M. DeSimone  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 471-5566  
kdesimone@chapter13trusteewdpa.com  
Chapter 13 Trustee

AND NOW, this 25th day of October, 2022, upon consideration of the Stipulation entered into by counsel for GM Financial and with the Debtors, it is hereby ORDERED, ADJUDGED and DECREED that the terms of the foregoing Stipulation are hereby approved in their entirety.

BY THE COURT:  
  
jsf

The Honorable Jeffery A. Deller

In re:  
Matthew Charles Barr  
Michele Jane Barr  
Debtors

Case No. 22-70188-JAD  
Chapter 13

District/off: 0315-7  
Date Rcvd: Oct 25, 2022

User: auto  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 27, 2022:**

**Recip ID**                   **Recipient Name and Address**  
db/jdb                   + Matthew Charles Barr, Michele Jane Barr, 724 Syline Drive, Dysart, PA 16636-9500

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 27, 2022                   Signature:                   /s/Gustava Winters

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 25, 2022 at the address(es) listed below:

Name	Email Address
Brian Nicholas	on behalf of Creditor RELIANCE SAVINGS BANK T/A RELIANCE BANK bnicholas@kmlawgroup.com
Jeffrey Wayne Ross	on behalf of Debtor Matthew Charles Barr jross@shepleylaw.com bk@shepleylaw.com
Jeffrey Wayne Ross	on behalf of Joint Debtor Michele Jane Barr jross@shepleylaw.com bk@shepleylaw.com
Lauren Michaels	on behalf of Creditor Office of Attorney General Department of Revenue lmichaels@attorneygeneral.gov
Office of the United States Trustee	ustregion03.pi.ecf@usdoj.gov
Ronda J. Winnecur	

District/off: 0315-7

User: auto

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Date Rcvd: Oct 25, 2022

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cmevf@chapter13trusteewdpa.com

William E. Craig

on behalf of Creditor AmeriCredit Financial Services Inc. dba GM Financial ecfmail@mortoncraig.com,  
mhazlett@mortoncraig.com;mortoncraigecf@gmail.com

TOTAL: 7